

**FEBRUARY 20, 2008**MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**08 C 1048**

AARON PATTERSON, BARRY & )  
LOEWY LLP, and AVILA & TOMIC LLC, )  
)

Plaintiffs, )

vs. )

THE PEOPLE'S LAW OFFICE, G. FLINT )  
TAYLOR, JOEY L. MOGUL, MICHAEL )  
E. DEUTSCH, STANDISH E. WILLIS, and )  
J. SAMUEL TENENBAUM, )

Defendants. )

No.

**JUDGE DARRAH****MAGISTRATE JUDGE VALDEZ**

Judge

**NOTICE OF REMOVAL**

To:	Barry & Loewy LLP The Frost Tower Suite 1540 401 Congress Avenue Austin, Texas 78701	Avila & Tomic LLC Suite 2000 227 W. Monroe St. Chicago, IL 60606-5053	Aaron Patterson #21664-424 U.S. Penitentiary Big Sandy P.O. Box 2068 Inez, Ky 41224
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Please take notice, that pursuant to 28 U.S.C. § 1446 defendants People's Law Office, G. Flint Taylor, Joey L. Mogul, Michael E. Deutsch, Standish E. Willis, and J. Samuel Tenenbaum, today removed this action to the United States District Court for the Northern District of Illinois, Eastern Division, for the reasons set forth below:

1. Plaintiff's action, originally brought in the Circuit Court of Cook County, County Department, Law Division, was filed on January 7, 2008.
2. The Complaint was served upon J. Samuel Tenenbaum on January 28, 2008, on Standish Willis on or about January 31, 2008, and on People's Law Office on February 5, 2008.

The remaining defendants have not been served.

3. The Summons and Complaint, copies of which are attached hereto as Exhibit A, constitute all process, pleadings and orders that have been served upon the defendants in this action.

4. In the complaint plaintiffs claim that defendants have committed several acts of misconduct with respect to the request for attorneys' fees of People's Law Office and Standish Willis in connection with their representation of Aaron Patterson in a case currently pending before the United States District Court for the Northern District of Illinois, Eastern Division, entitled *Patterson v. Burge*, 03-4433 ("Patterson v. Burge").

5. In particular, the Complaint alleges five counts: (1) a request for Declaratory Judgment by all plaintiffs against all defendants (Count I); (2) Breach of Contract between plaintiff Aaron Patterson and defendants People's Law Office, G. Flint Taylor, Joey L. Mogul, Michael E. Deutsch and Standish E. Willis (Count II); (3) Civil Extortion, allegedly committed against all plaintiffs by all defendants (Count III); Conspiracy to Commit Civil Extortion, allegedly committed against all plaintiffs by all defendants (Count IV); and intentional infliction of emotional distress, allegedly committed against Aaron Patterson by all defendants. (Count V).

6. The gravamen of the complaint is that a justiciable controversy exists regarding the rights and status of the parties, and the Court should declare the asserted attorneys' lien of People's Law Office and Willis invalid and hold that People's Law Office and Willis are not entitled to settlement proceeds in *Patterson v. Burge*. (Complaint 26-31); People's Law Office breached its contract with Patterson when it withdrew from representing him in *Patterson v. Burge* (Complaint 32-36); People's Law Office, together with J. Samuel Tenenbaum, somehow

committed extortion and conspiracy to commit extortion when People's Law Office filed an attorneys' lien in *Patterson v. Burge*, and People's Law Office and J. Samuel Tenenbaum attempted to enforce and resolve the lien (Complaint 38-42, and 44-50); and the filing of the attorneys' lien, and the efforts to enforce and resolve the lien through litigation and settlement negotiations were so extreme and outrageous that they somehow caused Patterson great emotional distress. (Complaint 52-56).

7. *Patterson v. Burge*, currently pending before the United States District Court for the Northern District of Illinois, raises substantially identical allegations to the allegations against the defendants in this lawsuit. Specifically, defendants People's Law Office, G. Flint Taylor, Joey L. Mogul, Michael E. Deutsch and Standish E. Willis have filed a Motion to enforce the very lien which is the subject of this lawsuit, and have requested the very relief - payment of a large sum of money - which is alleged in this lawsuit to constitute extortion and intentional infliction of emotional distress. Further, in *Patterson v. Burge*, the plaintiffs in this action have asked the Court to find that defendants People's Law Office, G. Flint Taylor, Joey L. Mogul and Michael E. Deutsch and Standish E. Willis should receive nothing as a result of this lien because they breached their contract with Mr. Patterson, and that People's Law Office and J. Samuel Tenenbaum committed misconduct by attempting to enforce the lien, and People's Law Office and Willis thereby forfeited any right to attorneys' fees or costs. See DE 820, 828, 839, 856.

8. Pursuant to 28 U.S.C. § 1331, the United States District Court has original jurisdiction over the case of *Patterson v. Burge* since it arises under the Constitution of the United States. The Court is currently exercising that jurisdiction to determine the pending issue of the entitlement of People's Law Office, G. Flint Taylor, Joey L. Mogul, Michael E. Deutsch and

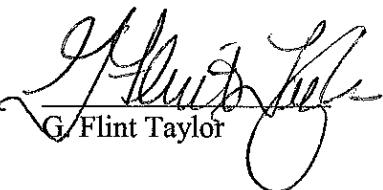
Standish E. Willis to attorneys' fees and costs. In addition, the court has supplemental jurisdiction over the attorneys' fees and costs issue, pursuant to 28 U.S.C. § 1367, since the attorneys' fees and costs dispute is part of the same case or controversy as the underlying litigation. *See Baer v. First Options of Chicago*, 72 F.3d 1294, 1301 (7th Cir. 1995).

9. This action is thus removable pursuant to 28 U.S.C. § 1441 (a) and (c).

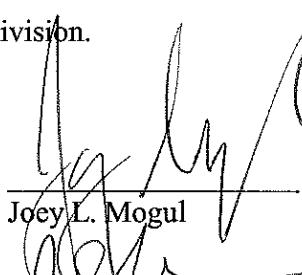
Wherefore, plaintiffs People's Law Office, G. Flint Taylor, Joey L. Mogul, Michael E. Deutsch, Standish E. Willis, and J. Samuel Tenenbaum hereby remove this case to the United States District Court for the Northern District of Illinois, Eastern Division.

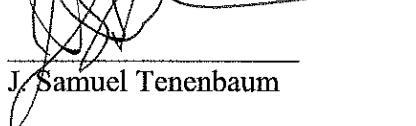
  
People's Law Office  
By John L. Stainthorp

  
Michael E. Deutsch,

  
G. Flint Taylor

Standish E. Willis

  
Joey L. Mogul

  
J. Samuel Tenenbaum

Respectfully Submitted

/s/ John L. Stainthorp

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773 235 0070

For defendants People's Law Office,  
G. Flint Taylor, Joey L. Mogul,  
Michael E. Deutsch and Standish E. Willis

/s/Daniel G. Rosenberg

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For defendant J. Samuel Tenenbaum

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G. Flint Taylor

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Respectfully Submitted

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For defendant J. Samuel Tenenbaum